

MEETING SUMMARY

Agricultural Best Management Practices (AgBMP) Technical Work Group

November 14, 2006; 10:00 a.m., Room 5100B

Arizona Department of Environmental Quality

1110 West Washington Street, Phoenix, Arizona

Attendees (Work Group members are starred): Cathy Arthur, Lindy Bauer, Emily Bonanni, Scott DiBiase, Pat Clay*, Jeanette Fish*, Dena Konopka, Rick Ladra*, Al Lopez, Andrea Martin, Corky Martinkovic, Steven Peplau*, Kevin Rogers*, Randy Sedlacek*, Joseph Sigg*, Wienke Tax*, Lisa Tomczak, and Nancy Wrona*.

Mr. Ladra opened the meeting and thanked all for attending. Mr. Ladra reviewed the October 11, 2006, meeting summary. During the last meeting the Workgroup reviewed BMPs that could potentially be added to the current BMP program in Maricopa County. Ms. Fish compiled a list of BMPs along with a description of each practice. Ms. Fish also provided the efficiency factors of each where available. The Workgroup decided during the October 11, 2006, meeting that some practices would work and others may not be viable. Some of the practices were explained including: BT cotton, GPS technology, crop rotation, and planting less intensive crops (e.g.; shift away from planting crops like cotton to planting crops that require fewer trips over fields which results in less dust). The Workgroup also discussed night farming, which results in less activity during the day. Night farming goes hand in hand with night harvesting. A specific example discussed was alfalfa cropping, which is harvested at night. The Workgroup also discussed the pink boll worm eradication program and a producer survey for Maricopa County Air Quality Department (MCAQD). Mr. Ladra then asked if there are any additions or corrections to the October 11, 2006, meeting summary. No additions or corrections were made.

The first item on the agenda was the suggestions offered by the Maricopa Association of Governments (MAG) as emission reduction practices. Lindy Bauer, from MAG, began her presentation with an update of the PM₁₀ 5 Percent Plan being developed by MAG. During the June 25, 2006, meeting MAG representatives said they would be modeling the Buckeye monitor for the attainment demonstration because the Buckeye monitor showed some of the highest readings. The Workgroup questioned using the Buckeye monitor because it is outside of the nonattainment area; monitors typically used for attainment demonstrations are located inside of a nonattainment area. MAG consulted with EPA based upon the concerns raised by the Workgroup. EPA indicated that MAG is not required to use the Buckeye monitor for the modeled attainment demonstration, and MAG has since revised the modeling protocol and removed the Buckeye monitor from the protocol for the attainment demonstration. Ms. Bauer said this does not remove agriculture from additional measures because there is agricultural land in the nonattainment area. EPA stated that even though MAG is not required to use the Buckeye monitor, the issue needs to be addressed by the State. EPA said it is up to the State to decide how it will address violating monitors. Typically when EPA sees a monitor violating standards outside a nonattainment area it starts considering expanding the nonattainment boundaries. Rather than expand the nonattainment boundaries, MAG suggested expanding BMPs to Area A outside of the nonattainment area in order to address monitors violating standards outside of the nonattainment area. Ms. Bauer suggested that the best situation would be to reduce the readings

at the Buckeye monitor, then there would be no issue for the State to address.

Ms. Bauer said MAG plans to hold a meeting of the Air Quality Technical Advisory Committee (AQTAC) on November 30, 2006. Currently, MCAQD is working on the 2005 emissions inventory (Clean Air Act stipulates the 5 Percent Plan must use the most recent emissions inventory). At this time the inventory is preliminary and more data will be gathered during the first part of 2007. The 2005 inventory will then be grown for 2007, 2008 and 2009. One critical issue for MAG is to have enough measures to show a five-percent reduction in emissions each year. Modeling must show attainment at all monitors for 2008 and 2009 across the board in addition to the 15 percent reduction in the emissions inventory over three years.

MAG has been working with the Arizona Department of Transportation (ADOT), Maricopa County, the Arizona Department of Environmental Quality (ADEQ), and relevant MAG staff on the 5 Percent Plan. MAG has given presentations to Arizona Rock Products and the AgBMP Technical Workgroup regarding emission reductions. MAG has also spoken with the Associated General Contractors and will also speak with an association of homebuilders. Past suggestions for emission reductions from agricultural activities included the impact of elimination of plow-downs once the pink boll worm is eradicated, staggering the plow-down, cessation of tilling on high wind days, the impact of the depletion of agricultural land, and applying BMPs to Area A in addition to the nonattainment area. New suggestions for reducing emissions from agricultural activities include eliminating night farming activities, enhancing proactive enforcement, producers submitting BMP plans and receiving a permit (so tracking can be done), stabilizing agricultural aprons and farm roads, implementing agricultural BMPs on Indian land, and restricting public access to unpaved farm roads and land to prevent cut-through traffic.

Ms. Bauer provided a copy of MAG's schedule for the 5 Percent Plan and also information on the process for selecting emissions reduction measures. At the November 30, 2006 meeting, MAG will propose to start the process with a preliminary draft of a comprehensive list of measures. From this point, MAG will request comments from AQTAC regarding their proposals. MAG's consultant, Sierra Research, is going to prepare descriptions on the draft comprehensive list after receiving comments. Once the comments and descriptions are complete in January they will be sent to committee and in-depth discussions will take place that will consider cost and advantages and/or disadvantages. In March, AQTAC will focus on suggested measures for the 5 Percent Plan and the contingency plan that will include measures to be done by the State, by the City of Phoenix, by the County, or measures to be implemented by all three. The list of suggested measures will go to the MAG Management Committee and MAG Regional Council. Once the list is approved, local governments will consider the measures they have authority to implement. Then the appropriate councils will pass resolutions and commit to implementation of the measures that are feasible. If local governments or other entities decide some measures are not feasible they must provide reasons for the decision. MAG will work with the State on those measures falling under State authority. Ms. Bauer reminded the Workgroup that the development of the 5 Percent Plan is also a legal process and, therefore, any measures in the plan become legally binding commitments and, upon EPA approval, federally enforceable. MAG plans on hosting a workshop and go over the process in greater detail. Measures that local governments commit to implementing come back to MAG. MAG will then review each measure and commitment and will develop emission reduction assumptions for each

one. The goal is to demonstrate that commitments will be sufficient to attain the PM₁₀ standard through modeling, meet the five-percent reduction, and produce clean data at the monitors. Once the final analysis is complete, the plan will go to public hearing. MAG will then respond to any comments and the draft final plan will go back to AQTAC for recommendations to the MAG Management Committee and to Regional Council. The final document will be delivered to ADEQ for submission to EPA.

Concurrently, MAG is continuing to conduct PM₁₀ research. A silt loading study designed to track various types of roadways in the nonattainment area to determine how much silt is actually on the roads is progressing. This information will help refine emission factors used for air quality monitoring. In addition, a PM₁₀ source attribution and deposition study is focused on determining what is specifically contributing to the problem at the monitors. Continued exceedances at the monitors would require re-evaluation of the current PM₁₀ plan of 77 measures, some of which are the most stringent in the country. MAG hopes the initial 5 Percent Plan through 2009 will be successful and reduce emissions so they do not have to do additional 5 Percent Plans each year.

Mr. Rogers asked Ms. Bauer if she had handouts with the newly suggested agricultural measures to give to the group. The first measure discussed by the Workgroup was elimination of nighttime farming activities. Mr. Rogers asked what definition MAG is using for “nighttime farming”. Ms. Bauer said it has not been defined yet. Mr. Rogers asked if they chose nighttime farming because of the plowing that was done in Buckeye just before the plow-down deadline. Ms. Fish commented that nighttime activities could specify tillage activities. Ms. Fish added that baling is done at night and that practice cannot simply be stopped. Mr. Rogers said that the definition should not be too broad and thus eliminate all nighttime farming activities. Mr. Sigg commented that baling is done at night because of higher moisture in the air; baling cannot be done in the sun without increased dust. Mr. Domskey said that this discussion is an opportunity for the workgroup to help MAG define these measures. Mr. Rogers said they would like to get MAG’s perception of these additional measures. Mr. Ladra said that there are a lot of farm activities that can only be done at night, and he is concerned about how broadly this measure would be applied, and added that this measure may hurt some farmers. Mr. Ladra said one example is the small farmer who has a couple of tractors who must run activities 24 hours a day. Ms. Bauer said the intention is not to hurt anyone; the intent of the plan is to stop the dust. Mr. Rogers said they need defined measures in writing to be able to justify why they agree or disagree with the measures. Ms. Bauer asked if defining “nighttime activities” as plowing would be better. Ms. Fish said that it could be defined as activities that produce PM₁₀ emissions. Mr. Rogers said they should discuss all of the options to make sure they understand them and then identify the ones they are prepared to present to the AgBMP Committee for consideration.

The next potential measure discussed was enhanced compliance and strengthened enforcement. Ms. Bauer said this measure would entail submitting a BMP plan and receiving a permit. Mr. Rogers said that farmers currently obtain a general permit.

Another measure was stabilizing agricultural aprons and farm roads. Mr. Ladra asked for more detail about what MAG is seeking from this measure. Ms. Bauer said that some farm roads are not paved and generate dust, and she asked if there is a way to stabilize the roads. Mr. Lopez

said a lot of the roads are rights-of-way and there is no way those can be blocked off. Most farmers block off the private roads on their farms because they do not want dust generated either.

Restricting public access to unpaved farm roads and land to prevent through traffic was the next measure discussed. A comment was made that this suggestion should be treated carefully because there have been liability issues with this type of action.

Ms. Bauer said MAG will speak with EPA and the tribal community regarding the potential measure of implementing agricultural BMPs on Indian land.

Ms. Bauer said that the comments from the Workgroup suggest that MAG has a lot of work to do regarding control measures. The Workgroup's input is appreciated because MAG does not want to hurt the economy of the region. She added that all sources of PM₁₀ emissions will be on the table. Ms. Fish asked who MAG had contracted to conduct the research. MAG responded that Sierra Research and Technical Business Systems are conducting the PM₁₀ source attribution study; the University of California at Riverside is conducting the silt loading study.

Mr. Ladra commented that it is interesting to note how far apart we are on some matters only because of the misunderstanding of what farmers do and how they do it. Mr. Ladra said that the farmers might have to be very specific regarding farm practices in order to show exactly what farmers are capable of doing; photos of practices may be included. Mr. Ladra said he is afraid that some of the measures MAG is suggesting may hurt farmers or put some out of business. Ms. Bauer said MAG is willing to meet with farmers in order to understand farming activities. MAG does not want to put measures on the table that are ineffective or will put people out of business. If the Workgroup has other ideas MAG is willing to hear them. Mr. Rogers said that this Workgroup reports to the larger AgBMP Committee. The Committee will review and analyze the Workgroup recommendations and then decide on any needed changes, whether through a revision to the AgBMP rule or another process.

Mr. Rogers said the previous process of developing BMPs had some of these suggestions and gave farmers different options to choose from, allowing the farmer to use the BMPs best for them. Mr. Rogers suggested that MAG look at the previous BMPs. The nighttime farming suggestion concerns them the most because equipment is expensive, and farmers may only have a few pieces of equipment. This means they may only be able to do certain activities at specific times of the day or only at night; we do not want to penalize farmers who are restricted like this. MAG should look at the data to discover if most activities are done during the day except the time period during tillage before the plow-up due to the state law requirement to meet the legislative deadline (tillage is done in west Buckeye, but also in Coolidge, Maricopa, or Scottsdale). Ms. Tax asked if the list from the Workgroup should be reflected in MAG's list of measures at this time or should it be reviewed by the AgBMP Committee first. Mr. Rogers said that it should not be included until the AgBMP Committee reviews the Workgroup's list. Mr. Ladra agreed that the process is to submit information to the AgBMP Committee first, not from the Workgroup to MAG to the AgBMP Committee. Ms. Tax commented that this information has to feed into the 5 Percent Plan at some point. Ms. Fish said that the AgBMP Committee will not meet prior to MAG's November 30th meeting.

Ms. Fish commented that MAG's fourth suggestion, stabilizing agricultural aprons and farm roads, needs to be separated out because those are two different practices. Mr. Rogers said that the difference is "something by a road" as opposed to "something in a field". Ms. Fish added that it depends on the farming operation. Ms. Bauer reiterated it would be better if the draft comprehensive list has good measures on it and not measures that are inappropriate. The November 30th meeting of MAG's AQTAC is just the first meeting in this process and Ms. Bauer stated that it could be mentioned at the meeting that the AgBMP Committee is working on examining these measures as well as additional measures. Mr. Rogers said that it is wise to say that so it is understood that all sources of PM₁₀, including agriculture, are looking at ways to reach attainment. He added that we need to make sure MAG understands what we are doing and what has already been done to date so people do not feel that agriculture is starting from zero. Mr. Rogers said Ms. Bauer could also mention the menu options found in the BMP booklet because it includes options that producers already use. Mr. Rogers also said that if there are people who do not want to be in compliance with AgBMPs, ADEQ has the ability to restrict access to a general permit. Mr. Rogers said that it will be interesting to see the impact of land conversion from agriculture to other land uses within the nonattainment area and how that reflects contribution from agriculture to PM₁₀ emissions.

Ms. Bauer said that Maricopa County's PM₁₀ Serious Area Plan contains the BMPs as a contingency measure. This was approved by EPA and survived legal challenge. Ms. Bauer added that a lot of work has been done by all sources and MAG is not starting from square one and is not under the impression that agricultural sources are not doing anything regarding PM₁₀ emissions; but more needs to be done because of the violations at the monitors. Ms. Bauer said the situation is challenging because we are trying to attain the standard and comply with the law, but we also have the transportation plan and industries to consider and do not want to get into a situation involving sanctions on any of the different sources.

Mr. Rogers suggested that the group review the list developed by the AQTAC on potential additional BMPs for consideration by the AgBMP Committee.

Before moving to the next item on the agenda, Mr. Rogers introduced Andrea Martin from the Department of Agriculture. She is filling the position formerly held by Marcia Colquitt.

The next item discussed was the producers' survey being sent by MCAQD. The survey has been reviewed by several ADEQ staff members. Ms. Konopka said the preliminary emission inventory they are working on includes tillage, harvesting, and unpaved roads based on the URS/ERG methodology. Any information received from the survey can be incorporated into the January version of the draft inventory that will be presented to MAG. Ms. Konopka asked for feedback regarding which version of the survey would be best to use, the shorter version or the longer version. She also said ADEQ developed a map with the zip codes and township/range information for the nonattainment area including boundary splits so producers can determine the farmland that is actually located within the nonattainment area. Ms. Martinkovic said that Brett Cameron from the Department of Agriculture had a list of growers in the nonattainment area that he would provide to MCAQD and the Arizona Farm Bureau (AZFB) to use for the survey. Ms. Konopka asked Ms. Fish and Mr. Sigg about the timeframe for mailing the survey so she could get the final copy finished in order to mail the survey. They said if they get the final copy by the

end of the week or early the following week it could be sent before Thanksgiving.

Mr. Ladra said that his understanding from the discussion during the previous Workgroup meeting was they preferred the one-page version of the survey. Ms. Konopka said that she just wanted to make sure the survey had enough space needed to provide all of the appropriate information from the producers. The one-page version only has enough space to enter information on four to six crops. Mr. Clay said that the two-page version appears daunting and there may be only a few farmers who need to enter more information. It is likely that there will be more responses with the shorter version.

Mr. Ladra asked if the survey addresses the zip code issue. Ms. Konopka said that the surveys are being mailed using the AZFB list of farmers using zips within the nonattainment area. There is also a question on the survey asking if the farmer has land in the nonattainment area because there are zip codes in and outside of the nonattainment area. Mr. Rogers said that the list of grower permits in Maricopa County would be a better list and match against the zip codes in the nonattainment area.

Mr. Lopez commented that some farmers may have up to 15 or 18 crops, and it may be easier to group according to type of crop. Ms. Konopka said the issue is that each crop can have different emission factors or they have different tillage passes. If there are differences they need to have that information in order to develop an accurate emission inventory. Mr. Lopez said that melons and root crops are generally the same for planting and harvesting. He said the leafy vegetables are usually the same as well. Mr. Rogers said that may be possible to divide up the vegetables into two or three groups. If grouping will make sense and provide the necessary information, it may be easier than being specific with each crop grown as farmers growing specialty crops could be overwhelmed. Mr. Lopez's concern is that the specificity of the survey could be used to come back to farmers growing certain crops and tell those farmers to use more control measures. Ms. Fish said that they are only trying to show the impact of emissions.

Mr. Ladra said that the majority of the survey will only apply to people with no more than four crops. Ms. Konopka said she also added questions asking for the name of who completed the survey and how to contact them. The consensus of the Workgroup was to use the one-page survey and eliminate the redundant question.

Mr. Rogers suggested that MCAQD give the farmer the opportunity to complete the survey online to give people options.

Mr. Rogers asked why MCQAD wants to know if a producer is a dairy or nursery. Ms. Konopka said the acreage they are using is from agricultural statistics, those statistics do not include nurseries, and she is not sure if they include dairies. Mr. Rogers asked if they should formally include the nurseries in future AgBMP Committee discussions to find out if they should be included in the statistics. The dairy acreage is in agricultural statistics, but only cropland is subject to BMPs.

Ms. Fish commented on question six and question seven. These questions are broken out according to tillage and harvest. According to the BMP program a farmer only has to choose one

BMP for both practices. Ms. Konopka said the reason why they are split out is MCAQD calculates the emissions for tillage and for harvest. Ms. Wrona said the split has the potential to show more impact of the BMPs by virtue of the fact that people are probably using more, and the split will give them the opportunity to show the impact of the practices.

The next topic discussed by the Workgroup was the BMP list for the AgBMP Committee. Mr. Rogers asked if the group was in agreement that the list is the one used at the previous Workgroup meeting. Ms. Fish said this was the list she developed and used at the previous Workgroup meeting. Ms. Martinkovic said that at the previous meeting the group agreed to combine night harvesting with night farming. Ms. Tax said that “organic practices” was combined with integrated pest management (IPM). Ms. Tax asked about the practices of using a shuttle system. Mr. Clay said the shuttle system is a practice used in the San Joaquin Valley Program, but the Workgroup considered it impractical. This practice has more to do with tree nuts. Mr. Rogers said that San Joaquin Valley is probably taking credit for a Module B instead of a cotton trailer; the Workgroup decided that since this is already used for our BMP program it should not be included in the list to present to the AgBMP Committee.

Ms. Martinkovic commented that there is no reference in the previous meeting summary about the practices of nontillage. Ms. Fish said it may already be in the current list of BMPs. Ms. Wrona referenced a comment from the meeting summary from the October 11th Workgroup meeting regarding the number of trips per day. She said reducing trips per day is close to reducing the speed on roads. Similar practices should be consolidated and sent to the AgBMP Committee for discussion.

Mr. Rogers asked the Workgroup if there was consensus about several of the practices to include on the list for the AgBMP Committee then asked to roll organic practices into IPM, include precision farming, and to include less than 10 trips/day and roll the shuttle system into the less than 10 trips per day. Mr. Ladra said the shuttle system is already used and the practice of using green chop is increasing and more people are encouraged to use this practice. Mr. Clay said the fact that the crop is chopped with high moisture reduces PM₁₀ emissions and he asked if night harvesting and night farming should be combined. Mr. Rogers said he did not think night harvesting contributes to PM₁₀ emissions as much and that it should be combined with night farming.

Ms. Bauer said that MAG originally suggested the elimination of night farming because of winter temperature inversions that occur in the Valley. Ms. Arthur said the PM₁₀ issue in San Joaquin Valley is primarily from high winds, and San Joaquin Valley has been able to attain the standard with their CMPs. Ms. Arthur said the issue in Maricopa County is winter stagnant conditions, and the violations at the Buckeye monitor occurred under those conditions rather than from high wind events. Mr. Rogers asked if it matters whether it is daylight or dark for inversion conditions. Ms. Arthur responded by saying it does matter; inversion conditions occur at night. She said that this is why MAG is requesting farmers not to operate at night, at least not in the winter during stagnant conditions.

Mr. Domsy provided an example of seeing a cotton harvest in October near Route 85. The sun was at the horizon, around twilight, and he could see the dust from a cotton harvest come up, hit

the inversion layer and spread out, staying under the inversion.

The Workgroup began discussing the final BMP list to present to the AgBMP Committee. The Workgroup decided to leave the night harvesting and night farming off the list. The only advantage from these practices is for the alfalfa growers, and they are already getting credit for claiming a permanent crop. Practices already on the current BMP list include nontillage, chemical tillage, and application efficiencies. Mr. Ladra said that ditches are not mass sprayed any longer; it is done with backpacks. The Workgroup agreed this practice is not applicable to put on the list to present to the AgBMP Committee because it is already part of current practices.

Ms. Fish said she would like to see transgenic crops on the list. She added that new transgenic crops continue to be developed. The Workgroup agreed to include transgenic crops to the list.

The next practice discussed was transplanting. The group agreed that it should be on the list. Mr. Lopez said they vegetable growers transplant quite a bit, and it would be helpful to leave it on the list.

The next practice addressed was less than 10 trips per day. Ms. Fish said that she believes it is futile to restrict farmers to less than 10 vehicle trips per day. Mr. Lopez agreed that there is no way to limit trips. Mr. Ladra said this practice could be chosen as an additional BMP. An alfalfa grower may have a worker only go down a road once or twice a month. Mr. Lopez said that the practice does not do any good unless the farmer waters the road. When he harvests, he has a worker that does nothing but water roads so when they go down 10, 15, or 20 roads it does not make a difference. Mr. Rogers said that a cotton farmer may go down roads for different reasons. The Workgroup decided to put it on the list.

The Workgroup revisited the practice of using a shuttle system. It was agreed that farmers cannot get extra credit because it is already used. This practice will not be put on the list.

Mr. Rogers said using BMPs in Indian Country is a good idea. Some farmers who farm land there already use BMPs without getting credit. This would require formal approval by EPA to use BMPs, however, as the BMP program has no jurisdiction on tribal land.

Through traffic on farmland is an issue, and farmers do not receive much help from law enforcement regarding trespass. Mr. Rogers said that it is not just a PM issue because there are people who are dumping trash on farmland; it is a PM-plus problem. Ms. Fish said another problem is if chains are put across a road and four-wheelers just go through the ditch. Mr. Rogers said something needs to be done about this issue.

Mr. Rogers listed each practice that the Workgroup agreed to include in the list for the AgBMP Committee:

- IPM;
- green chop;
- precision farming;
- transgenic crops;
- less than 10 trips per day; and

- transplanting.

The next topic discussed pertained to tillage that is part of the pink boll worm eradication program. Mr. Rogers said that Arizona Cotton Growers is committed to have a meeting with the growers in the west Buckeye area after the first of year before farmers start tilling. They will help farmers figure out different ways to stagger tilling days to avoid the last minute tillage before the deadline. The goal is to alleviate the issue that happened last year regarding PM₁₀ emissions. They want to educate the farmers about the issues and let them know that if the situation does not change, it will have to be dealt with in a regulatory manner. If the climate stays dry the harvest should go well, and there should be round the clock tilling across all of the farms.

The next topic discussed was the report to the AgBMP Committee. Ms. Wrona said that ADEQ will develop an outline, run it by the Workgroup, write a draft, and get the draft to Workgroup and the AgBMP Committee. Once the memo is completed and reviewed, a meeting of the AgBMP Committee will be arranged.

The next issue discussed included action on other options to include in the memo, in addition to adding BMPs. These other options included record keeping and other compliance related issues. The question was raised if the Workgroup should discuss these issues or should leave them to the AgBMP Committee. Mr. Rogers was of the opinion that those actions are up to a body other than the Workgroup.

The next topic discussed was the transition of farmland to a housing development. Ms. Martinkovic said that, regarding compliance issues, the County looks at the activity occurring on the land. If nothing is being grown and there is no activity on it, the county looks at that activity as a vacant or disturbed lot and the responsibility falls to the owner. Mr. Ladra asked what rule applies to this situation. Ms. Martinkovic said if there is no agricultural activity it gets classified as a vacant lot and falls under Maricopa County Rule 310. If there is agricultural activity it falls under the ADEQ complaint process. Ms. Fish commented that another example is when land is vacant and there are no plans to farm it but there is a law that says you cannot allow noxious weeds to grow on the land. She said in this situation a person has to go in and cut the weeds and if it is done with a tractor could be viewed as being agricultural activity. Problems arise when trying to resolve whether weed abatement is a form of tillage. Mr. Ladra asked for a clarification using an example: he sells property to a homebuilder and the homebuilder hires him to disc the weeds - does this fall under Rule 310 or not. Ms. Bonanni said that situation would fall under Rule 310. Mr. Ladra continued the example: he is not planting this season but will plant next season then it falls under ADEQ compliance. Ms. Bonanni said that when someone is no longer growing the activity falls under Rule 310. Ms. Martinkovic said Maricopa County needs to consider either dust mitigation or BMPs for these types of areas after determining where and to what extent this situation occurs.

Mr. Rogers said the major issue is the timing of the conversion. This transition normally is a six-month window, but the time can vary. A homebuilder can have a farmer crop until the last possible moment because the land will be taxed as agricultural land as opposed to residential use. Mr. Rogers said that this can result in advertisements to farm for free because someone wants to retain the agricultural tax status of the land. He also said that retaining the agricultural tax status

can be a good thing because a farmer cannot afford the tax increase until the land is converted. He asked if it is possible to get a handle on actual land conversion because of these issues. Mr. Ladra says that the problem is until the final plot is recorded and then converted or someone calls and makes a report that a piece of land has not been farmed for a long time.

Ms. Fish asked if aerial mapping would help. Mr. Ladra suggested going to the Farm Service Agency; if land is signed up as a farm – it is a farm. Ms. Arthur said what MAG has done is go to the Maricopa County Assessor files and compare cropland use. The records show about a four-percent reduction per year from 2001 to 2005. Agricultural statistics show that from 2000 to 2005 harvested acreage showed a 6.4 percent reduction. Ms. Arthur said they may want to apply a different attrition rate depending on what they are looking at; for example wind-blown dust (total acres of cropland) or tilling and harvesting (harvested acres). Mr. Ladra said you have to be careful with aerial photos because fields may not be farmed but it is still part of the farm. Ms. Arthur wants to use the acreage information to grow the inventory from Maricopa County. Ms. Arthur also said that they cannot tell, based on the reduction in cropland, what the impact will be to the five-percent emission reduction, but the reduction in cropland should help.

At this time Mr. Rogers made the official call to the public. There were no public comments. Mr. Clay asked the Workgroup about his status on the Workgroup because he has accepted new employment. Mr. Clay said that he will no longer be working for the University of Arizona; he will be working for private industry. Mr. Rogers said that since the Workgroup encourages all interested parties to be involved at this level and since he has worked with the Workgroup for awhile, it likely that he can remain affiliated. Mr. Rogers said he will bring up his status with the AgBMP committee.

The meeting adjourned at 12:30 p.m.

Action items

1. Producers Survey. [MCAQD]
2. Send the Maricopa County grower permit list to Ms. Konopka. [Department of Agriculture]
3. Labels of the grower permit list. [Department of Agriculture]
4. Notify Mr. Thelander about setting of an AgBMP Committee meeting. [ADEQ]
5. Status of Mr. Clay on future Workgroups. [AgBMP Committee]